

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

TAMARA JEAN FARRELL, )  
an individual, )  
Plaintiff, ) CASE NO.: 1:21-cv-00922-SCJ  
vs. )  
USPG PORTFOLIO FIVE, LLC, )  
a Georgia Limited Liability Company, )  
Defendant. )  
\_\_\_\_\_  
/ )

**JOINT NOTICE OF SETTLEMENT**

Plaintiff and Defendant, file this Notice of Settlement to advise the Court that they have reached an agreement regarding all material issues in this case. The parties are currently finalizing the language of their agreement and anticipate filing a joint stipulation for dismissal within twenty (20) days. The parties further request that all hearings and deadlines be adjourned.

Dated: October 5, 2021

Respectfully submitted,

/s/ John A. Moore  
John A. Moore, Esq.  
Georgia Bar No: 519792  
The Moore Law Group, LLC  
1745 Martin Luther King, Jr. Drive  
Atlanta, Georgia 30314

Respectfully submitted,

/s/ E. Graham Newsome  
E. Graham Newsome, Esq.  
GA State Bar No. 815149  
[gnewsome@GM-LLP.com](mailto:gnewsome@GM-LLP.com)  
Robert A. Luskin, Esq.  
Goodman McGuffey LLP

Tel: (678) 288-5601  
Fax: (888) 553-0071  
[jmoore@moorelawllc.com](mailto:jmoore@moorelawllc.com)

*Counsel for Plaintiff*

GA State Bar No. 004383  
[rluskin@GM-LLP.com](mailto:rluskin@GM-LLP.com)  
3340 Peachtree Road NE, Suite 2100  
Atlanta, GA 30326-1084  
Tel: (404) 264-1500  
Fax: (404) 264-1737

*Attorney for Defendant  
USPG Portfolio Five, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 5th day of October, 2021, I electronically filed the foregoing with the Clerk of Court by using CM/ECF system which will send notice of electronic filing to all counsel of record.

/s/ John A. Moore  
John A. Moore, Esq.